approximately $41 million to ubiquitously equip its operator sites with AABS software and hardware, which could substantially eliminate double-operator concerns and speed call-processing. Thus, United would incur a combined system cost of approximately $53 million to equip its network with the essential features necessary to implement billed party preference ubiquitously and in a consumer-friendly fashion.[13] Preliminary vendor discussions indicate that the cost to equip the LEC network with software and hardware to provide billed party preference will not vary based on whether billed party preference applies to interLATA payphone traffic; all interLATA public phone traffic; all interLATA 0+ traffic from any phone; or all 0+ and 0- traffic from any phone.

With respect to the interexchange carriers, the system development costs for being able to handle billed party preference should be relatively small, assuming the LECs utilize uniform technology and signalling for billed party preference. Lack of uniformity could unnecessarily drive up the costs of the OSPs. Assuming uniformity, the most significant cost for the OSPs is likely to be the cost of replacing cards that are

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[13]This cost estimate is not definitive. The costs specified above reflect only direct capital and expense estimates as detailed in Exhibit B, and do not contain the necessary and customary labor and internal overhead loadings. Further, United has not yet quantified other costs such as the necessary LIDB software modifications, operator site modifications, interoffice facility costs, trunk rearrangement costs, coin instrument instruction modifications and customer notice expenditures, as well as other SS7, billing, and service order modifications. However, United expects that these costs would be small in relation to the costs discussed above. The cost of equipping operator sites with AABS hardware and software is discussed further in Section VII, below.

incompatible with billed party preference. This cost, which Sprint estimates to be in the neighborhood of $2 per card (including the card itself and appropriate instructional materials), can be minimized if, as Sprint has urged in Section III above, the Commission requires fourteen-digit screening in LIDBs so that OSPs can retain proprietary line-numbered cards.

As noted above, the Commission also asked for comment on how the costs of billed party preference would affect the rates paid by consumers. Sprint has no way of estimating the total industry cost of implementing billed party preference without reviewing the cost estimates of other local exchange and interexchange carriers. Thus, Sprint expects to be in a better position to comment on this issue in its reply comments. However, Sprint believes that billed party preference is properly regarded as a new service and should be treated as such for rate development purposes for price cap LECs. LECs would then devise a rate reflective of the increased costs related to the implementation of billed party preference and those costs would be passed on to the OSPs through access charges, presumably on a per-call basis.

This does not necessarily mean that the total rates to the public will increase. Focusing competition on providing economical and efficient service to the consumer, rather than maximizing commission payments to public phone premises owners, would have a countervailing effect on OSP costs. In addition, the development of automated call processing in order to avoid the "double operator" problem discussed in the next section could substantially reduce operator service costs below present levels.

Finally, the OSPs would avoid the marketing and sales costs they presently incur in public phone presubscription.

VII. THE DOUBLE OPERATOR PROBLEM CAN BE MINIMIZED THROUGH AABS AND SS7.

In paragraph 26 (7 FCC Rcd at 3031-32), the Commission requested comment on the extent to which callers would have to provide the same information twice--to the local exchange carrier and the interexchange carrier--in a billed party preference environment,[14] the extent to which this problem could be alleviated by deployment of SS7 and AABS technology by the LECs, the costs involved and implementation time required for deployment of this technology, the costs and availability of technology required for operator service providers to receive this information, and finally, whether there is any customer premises equipment that could avoid the need for providing the same information to two different operators.

Sprint believes it is in the interest of all segments of the industry to do whatever is necessary to minimize this "double operator" problem. Consumers are going to be confused and displeased if they have to provide the same information twice to two different operators in order to complete a long distance call. The use of two "live" operators is expensive and time-consuming as well, and this expense and time would inevitably be

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[14] For example, in the case of a collect call, having to give the LEC operator the called number and, after the LEC determines the OSP preferred by the called number and connects the caller with that OSP, having to provide the called number again to the OSP.

borne by the consumer. However, Sprint believes that a properly structured automated system of billed party preference should minimize the "double operator" problem.

To begin with, on calling card calls, which account for close to half of the interexchange operator service calls today, SS7 and EAOSS should eliminate the "double operator" problem altogether. The LEC should be able to forward to the IXC all of the necessary information for billing and completion of the call, including the originating ANI, the called number and the number of the calling card (either LEC or IXC) to which the call is being charged.

Thus, the "double operator" problem might only arise in instances where SS7 signalling is not employed or where the call is a collect call, or a call that is billed to a third number, or a person-to-person call. The advent of AABS technology should alleviate the "double operator" problem for most of these calls as well. When AABS is deployed, the customers can make a collect call by dialing 0+ the called number; at that point, AABS permits a series of voice prompts (e.g., "To make a calling card call press 1, to make a collect call press 2..."). If the customer wishes to make a collect call, AABS will ask the caller's name, will perform a LIDB look-up to determine the 0+ carrier associated with the called number and place a call via that carrier to the called number, and will use automated voice technology to determine if the called party will accept a call from the calling party. If the called party accepts, the LEC would provide all of the necessary call detail and billing information to the IXC. A

similar procedure would permit automated handling of billed-to-third-number calls.

It may be noted that not all AABS systems that are available off the shelf today include these capabilities, but some do, and there is no reason why other AABS systems should not be able to incorporate these capabilities by the time billed party preference can be implemented. The incorporation of voice-recognition technology should permit the automated handling of collect and third number calls from rotary dial phones, as well. AT&T has already begun to deploy such technology. Thus, with the deployment of AABS and voice-recognition technology, the "double operator" problem should largely disappear.

With respect to the cost of deploying these capabilities, United believes that AABS will be required at each operator site. Based on preliminary discussions with its vendors, United estimates that it would cost nearly $1.5 million per operator site to equip its 20 operator sites with the necessary AABS software and hardware. Additionally, United will have to incur costs estimated to be approximately $1.9 million for each of its six projected host offices, for a total estimated AABS cost of approximately $41 million.[15]

In framing its question about the "double operator" problem, the Commission was correct in suggesting the possibility that the availability of the technology needed to alleviate this problem

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[15]These estimates do not include all related costs or overheads. See n. 13, supra.

could be more of a problem for independent LECs than for the RBOCs. Because so much of this cost is site-specific and not dependent on volume, independent LECs like United may incur costs not unlike those of an RBOC.[16] However, the RBOCs will have a much broader base of demand over which to spread these increased costs than United, whose territory is geographically diverse and thinly populated. We urge the Commission to be mindful of this factor in ordering billed party preference implementation.

Yet, for reasons that will be discussed in Section XI, below, Sprint believes it is highly desirable to have a uniform nationwide date for implementing billed party preference. Rather than delaying the implementation of billed party preference until the time when the last local exchange carrier can install the SS7 and AABS capabilities needed to minimize the double operator problem, Sprint believes it is preferable to set a reasonable deadline for nationwide implementation of billed party preference and set forth the standards it expects to be employed. As a result of the sharply differing economics related to ubiquitous deployment of AABS, the Commission should adopt a different service standard regarding AABS implementation for the RBOCs, on the one hand, and the independent LECs, on the other hand, at the time of billed party preference implementation, so that the independent LECs will have more time to fully implement the optimal technology for billed party preference.

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[16]This assumes an RBOC would have a similar number of operator sites within its region compared to United on a nationwide basis.

In the meantime, to the extent that the double operator problem cannot be alleviated by SS7 and AABS technologies, local exchange carrier operators should be considered as the alternative solution and thus function as agents on behalf of IXCs so that, in fact, two "live" operators will never be required to complete any call.

VIII. THE IMPACT OF BILLED PARTY PREFERENCE ON ACCESS TIMES.

In paragraph 27 (7 FCC Rcd at 3032), the Commission poses a series of questions relating to the impact of billed party preference on access times and call set-up for operator service calls. Sprint's best estimate for calling card calls is that the call set-up time, including the time needed by the local exchange carrier to perform a LIDB look-up and validation or to route the call to the IXC on the basis of a six digit screening of the calling card number at the LECs switch, should take less than four seconds. With the implementation of AABS technologies, completing an automated collect or billed third party call may well take less time than such calls require today using "live" operators.

However, it is very difficult to compare access and call set-up times under billed party preference with the time that is required today. At the present time, a consumer must go through the steps needed to ascertain whether an access code is needed and, if so, which access code to use, as well as the time taken to input whatever access code is required. Ascertaining whether an access code is needed may involve asking the customer's host (in the case of a business or residential phone) the identity of

the presubscribed carrier or searching the signage that is supposed to be posted on or near public phones for the identity of the presubscribed carrier. All things considered, Sprint would expect billed party preference to seem very fast to consumers as compared with the complicated decisions they face today.

IX. THE IMPACT OF BILLED PARTY PREFERENCE ON COMPETITION IN THE PROVISION OF PAYPHONES.

Today, competitive payphone providers receive commissions from the presubscribed carrier for calls handled by that carrier, which they share with the premises owner. In the case of "smart payphones," which account for roughly half of COCOT phones, the operator service function for most calls is handled internally, thus enabling the payphone provider to use the difference between the 1+ rates paid to a long distance carrier and the 0+ rates charged to the consumer to generate an additional source of revenue. There is little question that billed party preference, by routing calls automatically to the customer's preferred carrier, would decrease the revenue streams available to competitive payphone providers. It is not clear whether this reduction in the revenue stream would be fatal to the competitive provision of payphones. What little evidence is available shows that two-thirds of the revenue from COCOT phones comes from coin calls, which would not be directly affected by billed party preference.[17]

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[17] See Comments of APCC, dated November 7, 1991, in CC Docket No. 91-35, Appendix A, Table 1. These data show that of total revenues of $238 per phone per month, $160 came from coin calls.

If the Commission is concerned about this revenue impact and believes that the impact on competitively provided payphones would be likely to adversely affect the public interest, there are other proceedings pending before the Commission that are more narrowly focused on the competitive payphone industry.[18] Without debating the merits of the relief sought in those proceedings, such proceedings are more appropriate procedural vehicles for examining in depth the competitive payphone industry.

X. THE BENEFITS OF BILLED PARTY PREFERENCE ARE NOT AVAILABLE THROUGH AN ALTERNATIVE, LESS COSTLY TECHNOLOGY.

The Commission, in paragraph 29 of the NPRM (7 FCC Rcd at 3032), asks for comment on whether the benefits of billed party preference are obtainable through less costly technologies than the billed party preference system described above. Sprint is unaware of any such alternative technology at this time.

XI. THE SCOPE OF BILLED PARTY PREFERENCE.

In paras. 30-32 (7 FCC Rcd at 3032), the Commission raises a number of issues about the scope of billed party preference, including whether it should apply to all local exchange carriers, whether Part 68 should be amended to preclude traffic aggregators and payphone providers from circumventing billed party preference, the time-frame within which billed party preference can be implemented, and whether it should apply to (a) just 0+ calls

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[18] See, e.g., Public Telephone Council's Expedited Petition For Declaratory Ruling, dated July 18, 1988 (DA 88-2055); and Petition For Declaratory Ruling of the American Public Communications Council, dated April 21, 1989 (DA 89-517).

from payphones; (b) to all interLATA 0+ public phone calls; (c) all interLATA 0+ calls (including those made from business and residential phones); or (d) all 0+ and 0- interLATA calls.

Sprint submits that the public can fully realize the benefits of billed party preference only if it is universally available throughout the United States from all phones for domestically paid-for 0+ and 0- calls. To implement billed party preference only in territories of certain local exchange carriers will result in hopeless confusion to consumers who would have to use different dialing patterns every time they cross the unmarked boundaries between one local exchange carrier and another. Furthermore, there is no reason why billed party preference should be restricted only to payphones or other public phones. As discussed in Section VI above, the costs of implementing billed party preference are likely to be no greater for comprehensive implementation than for implementation that is restricted to particular types of phones. Therefore, the effect on the consumer of plenary implementation will be to lower the unit cost of billed party preference, since the fixed implementation costs will be spread over a greater number of phone calls.

In order to prevent traffic aggregators from subverting billed party preference through dial-around mechanisms that would frustrate consumers' efforts to reach their preferred carriers, Sprint agrees with the Commission's tentative conclusion that Part 68 should be amended to prohibit any such practices.

As noted above, Sprint supports billed party preference for all domestically-paid-for calls. There are certain types of operator service calls than cannot be handled in a billed party

preference environment, for example, collect calls to foreign countries. There is no practicable way of associating a foreign telephone subscriber with any particular U.S. IXC at the present time or for the foreseeable future. Therefore, when a customer wishes to place a collect call to a foreign destination, the LEC operator should hand the call off to the IXC preferred by the calling party.

Sprint believes that the presence or absence of equal access in a given end office will not impact the availability of billed party preference. When a 0+ call originates from a non-equal access exchange, the call will be forwarded to the operator tandem, where a query will be launched to determine the presubscribed IXC (either chosen or default), with the call then being handed to that IXC. This is not unlike what occurs when a 0+ call originates in an equal access office. In effect, the presubscription of the 0+ carrier is an operator tandem/LIDB intelligence feature and not an end office intelligence feature.

As for when billed party preference can be implemented, the principal tasks involved in implementing billed party preference are the deployment of the AABS systems needed to minimize the double operator problem, and development and deployment of LEC switch modifications to permit routing on the basis of LIDB look-ups and six-digit screening of OSP-issued cards. Before these modifications can be undertaken, further work will have to done within the industry to finalize the technical standards for billed party preference and for the interfaces between the local and interexchange carriers. At the same time, it is unrealistic for the Commission to expect that the industry will expend any

substantial sums towards the implementation of billed party preference without a clear and explicit ruling by the Commission as to whether billed party preference must be implemented and if so, the scope of that implementation. Sprint believes the best approach is to allow a length of time sufficient to permit the principal local exchange carriers (e.g., the RBOCs) to fully deploy the technology that will be needed to minimize the double operator problem, and to fix that date for a nationwide deployment of billed party preference by all LECs. However, as discussed above, it would be appropriate to give independent LECs an appropriate additional period of time after their initial implementation of billed party preference to reach the same service standards that the Commission has set for the RBOCs.

Sprint expects that it will take a substantial period of time -- at least a year after the Commission issues a final order in this case -- for the industry to finalize the technical standards for billed party preference. Sprint's best guess is that it would take approximately two years after the finalization of the standards for implementation of billed party preference to be feasible. Thus, Sprint believes that the Commission should allow a period of approximately three years after the Commission issues a final decision in this case for implementation of billed party preference.

XII. THE COMMISSION SHOULD NOT REQUIRE BALLOTING FOR A 0+ PIC.

As discussed above, the local exchange carriers' LIDBs have the capability of storing a different PIC for 0+ calls (including

LEC calling card calls, collect and billed-third-number calls) than the consumer's 1+ carrier. In para. 33 of the NPRM (7 FCC Rcd at 3032-33), the Commission requests comment on how the 0+ PIC should be assigned. At the present time, Sprint's view is that the costs and possible customer confusion resulting from mandatory balloting for 0+ PIC would not be worth the benefits to IXC competition that such a balloting process could produce. Sprint believes it is unlikely that a significant number of customers would choose to establish a 0+ PIC that is different from their 1+ PIC. A mandatory balloting of all customers, simply to allow a small minority of customers to exercise their rights, could result in widespread confusion for consumers who may not fully understand the difference between 1+ and 0+ calls and may not be substantial users of 0+ services in any case. Many of these consumers may believe erroneously that they are being asked to switch 1+ carriers and, if they select a new 0+ carrier, may be surprised to find that their 1+ carrier has remained the same. Instead of balloting all customers, the LECs should simply be required to notify consumers that they have the right to request a different 0+ carrier than their 1+ PIC, and honor such requests through normal PIC change procedures.

However, if the Commission determines to require balloting, then Sprint supports the balloting process described in paragraph 33 of the Notice (7 FCC Rcd at 3032), namely that residential and business customers that do not send in their ballots would be defaulted to their 1+ carrier. Sprint believes that considerable consumer dissatisfaction would result if consumers who did not send in their ballots were allocated as they are in the 1+

balloting process, since, in a significant number of cases, consumers could wind up with different 0+ and 1+ carriers.

XIII. THE HANDLING OF COMMERCIAL CREDIT CARDS AND FOREIGN-ISSUED CALLING CARDS.

In paragraph 34 (id. at 3033), the Commission asks for comment on how commercial credit cards and foreign-issued calling cards would be handled in a billed party preference environment. At the present time, Sprint and other IXCs have partnering relationships with commercial credit card issuers and some foreign calling card issuers that involve the use of specialized access codes by the cardholders to reach the IXC's operator services. There is no reason why such partnering arrangements, using these special access codes, cannot continue in a billed party preference environment. Indeed, IXCs may continue to use access code arrangements for a variety of specialized services that they offer through their own calling cards to their users. Nonetheless, there is no inherent reason why commercial credit cards cannot be compatible with billed party preference and usable in a 0+ dialing sequence, provided that the credit card companies (1) use a standard numbering format so that the LEC can recognize the identity of the card issuer; and (2) create a LIDB database, accessible through industry standard interfaces, for validation of the calling card and identification of the IXC associated with that card. As far as Sprint is aware, no commercial credit card issuers have established such databases today, and it should be up to the calling card industry to decide whether to engage in that effort or instead to continue the partnering relationships they now have with IXCs.

Foreign-issued calling cards, to be compatible with 0+ dialing in a billed party preference environment, would also have to utilize a standard numbering format, and the foreign PTT would have to establish a LIDB database that is accessible by the local exchange industry. There are no such foreign LIDBs available today, and even if foreign LIDBs were established, the transmission expense for queries to the foreign LIDB could well be substantial unless those LIDBs were located within the United States. Thus, Sprint believes it is impractical, for the foreseeable future, to extend billed party preference to foreign-issued cards.

XIV. THE PRIMARY OSP SHOULD CHOOSE THE SECONDARY OSP FOR EACH LINE.

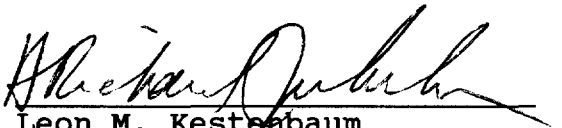
The final issue on which the Commission sought comment (para. 35, id.) is whether the selection of a secondary OSP in the LEC LIDB database should be made by the primary OSP or by the customer directly. As discussed above, the ability of the LEC LIDBs to store a secondary OSP is the key to making billed party preference workable for the smaller, regional OSPs. Thus, in order to facilitate their participation in billed party preference, the selection of a secondary OSP should be left to the primary OSP. This in no way would interfere with the consumer's ability to select a different carrier than the primary OSP for calling card calls: the consumer can carry as many calling cards from as many OSPs as he or she wishes to. However, to avoid customer confusion, the primary OSP should be required to notify its customers of the identity of the secondary OSP and to explain when the secondary carrier will be used.

XV. CONCLUSION.

Sprint welcomes the Commission's initiation of this rule-making proceeding and believes the detailed questions raised by the Commission should ensure the development of a comprehensive record on which the Commission can establish a firm schedule for implementing billed party preference.

Respectfully submitted,

SPRINT CORPORATION



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July 7, 1992

FLORIDA INTRA-LATA LONG DISTANCE USERS UNWEIGHTED TABLES

PREPARED FOR:
BELLSOUTH SERVICES, INC.

PREPARED BY:

Elrick and Lavidge, Inc.
An Elrick Company
[illegible]

JULY, 1989

LONG DISTANCE USERS
JULY 1985
(05-5375)

TABLE 005
Q5. IF YOU HAD THE OPTION TO SELECT A CARRIER FOR LONG DISTANCE BY DIALING A 5-DIGIT ACCESS CODE, WOULD YOU CHOOSE ANOTHER CARRIER OTHER THAN SOUTHERN BELL?

	<RESIDENTIAL>				<BUSINESS>			
		REVENUE GROUP				REVENUE GROUP		
	TOTAL	I	II	III	TOTAL	I	II	III
TOTAL	602 100%	201 100%	201 100%	200 100%	438 100%	200 100%	200 100%	38 100%
YES	112 19%	28 14%	37 18%	47 24%	85 19%	37 19%	41 21%	7 18%
NO	402 67%	142 71%	139 69%	121 61%	312 71%	147 74%	140 70%	25 66%
DON'T KNOW	85 14%	30 15%	25 12%	30 15%	38 9%	15 8%	18 9%	5 13%
NO ANSWER/REFUSED	3 0%	1 0%		2 1%	3 1%	1 1%	1 1%	1 3%

TABLES PREPARED BY ELRICK AND LAVIDGE/EQUIFAX

UNITED TELEPHONE SYSTEM COMPANIES

BPP COST ESTIMATE (1)

	# SITES	PER SITE			TOTAL
		CAPITAL	EXPENSE	TOTAL	
HOST/OC SITES	20	$ 880,000	$610,000	$1,490,000	$29,800,000
IVS HOST	6	$1,332,000	$557,000	$1,889,000	$11,334,000
AABS POTENTIAL TOTAL					$41,134,000
BPP SOFTWARE	20	--	$600,000	$ 600,000	$12,000,000
AABS + BPP					$53,134,000

(1) As described more fully in Section VI, this cost estimate does not include all of the costs to implement BPP.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing "Comments" of Sprint Corporation were sent via first class mail, postage prepaid, on this the 7th day of July, 1992, to the below-listed parties:

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Ruth Goddard

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July 7, 1992
*BY HAND